

Attached from the periodical *Floor Focus*, is a March 2003 article entitled "New Designs, Technology and Marketing Should Expand Tile Sales Far Beyond the Current Rate of \$700 Million Annually" (the "Article"). The Article traces the development of carpet tile beginning in 1958 and leading up to the subject matter of this invention and the creation by Assignee Interface's designer and Applicant here, David Oakey, of innovative tile designs (including those disclosed in this invention) that have revolutionized the industry.

The Article explains that:

For its first 20 years or so, carpet tile was a utilitarian and unattractive alternative to broadloom carpet that was used mostly for corporate work stations. Early styles mimicked wall to wall carpet's monolithic or directional looks.

Article, p. 21.

While broadloom carpet has been the traditional form of carpet floorcovering, the Article explains that the demand in the market (especially in commercial settings) for carpet tile has skyrocketed. Carpet tile manufacturers have invested great amounts of time and money in responding to market demand with innovative and creative carpet tiles. As clearly evidenced by the Article, Assignee of this application, Interface, has been at the forefront of such development efforts.

The Article describes carpet tiles that, while requiring placement in a prescribed direction, could be placed in random locations within the assembly (what the Article refers to as "random placement tiles"). The Article explains that Applicant Oakey then created the invention claimed in this patent application, which the Article refers to as "random installation tiles." These tiles may be installed in any directional orientation and in any location in the assembly (i.e., the tiles exhibit orthogonal ambiguity). Assignee Interface's brand name for the first embodiment of these random installation tiles is "ENTROPY."

The Article explains:

Entropy was the first of a generation of tiles that imitate nature, and, as Oakey puts it, just as no tree in the forest is exactly the same color or shape as any other, no tile in the Entropy line has exactly the same color or design as any other.

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This new design philosophy opens carpet tile to a whole new world of possibilities. Not only aesthetically – it creates a fresh, new look independent of both broadloom and quarter turned designs – but also functionally. Because the colorations in Entropy are random, designers no longer have to worry about replacement tiles or dye lots that don't match. And now that tiles can be so easily replaced, they have broader market applications, like the hospitality and education markets. Hotel maids or school janitors can easily remove a soiled tile and replace it with a new one, without worrying about matching it with the old one.

Article, p. 22.

The Article acknowledges that Applicants invented random installation (or orthogonally ambiguous) tiles, and the Article repeatedly touts the novelty and benefits of Interface's Entropy brand commercial embodiments of the invention claimed in this application. Thus, this Article demonstrates that the Actions are incorrect in asserting that the prior art (Eusemann, in particular) teaches what the Article acknowledges Applicants were the first to do, namely create carpet tiles having patterns that exhibit orthogonal ambiguity without pattern alignment between adjacent tiles.

Moreover, the Article acknowledges (at page 22) that Entropy has singlehandedly fueled additional growth in the carpet tile industry: "The flexibility that Entropy brought to carpet tile design fueled even greater growth in the category. Not surprisingly, this growth brought new manufacturers into the market."

Applicants' Assignee again requests withdrawal of the outstanding rejections and allowance of all of the claims pending in this Application.

Respectfully submitted,



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